Draft recommendation of the NOSB Livestock Committee:
Access to the outdoors for poultry

On behalf of the Humane Society of the United States, the nation's largest animal protection organization with seven million constituents, we wish to support strongly the recommendation of the NOSB Livestock Committee that organic poultry should be allowed access to the outdoors.

PRINCIPLES IN FAVOR OF OUTDOOR ACCESS

We agree that "Access to the outdoors fulfills an integral role in health care and living condition requirements in organic poultry production". Our support for your recommendation is based on all four of the principles you list as its intent:

1. To satisfy their natural behavior patterns

In addition to the natural behavior patterns you mention, these include foraging (which is a pervasive aspect of behavior in birds fed on concentrated diets), dust bathing and exploration. All these behaviors are much more readily carried out in the varied, extensive conditions provided outdoors than in the limited conditions of high-density housing.

Furthermore, varied, complex environments have other benefits: birds reared in such conditions show more adaptability, less susceptibility to stress and less fear of humans than those kept in barren conditions (Jones 1982).

2. To provide adequate exercise area

Adequate exercise improves foot condition and leg strength, as you say. It is also important for wing bone strength (Knowles & Broom 1990).

3. To provide preventive health care benefits

We concur with the statement that outdoor access has health benefits. Disease exposure can be avoided by (a) fencing outdoor areas to reduce ingress of wildlife, (b) feeding poultry indoors, which largely prevents the potential of wild birds to spread disease and (c) using different outdoor areas for successive flocks to prevent build-up of disease organisms.

Health benefits include reduction of stress and strengthened immunity. They also include varied nutrition where this is available. We understand your decision not to require such nutrition, but it should obviously be encouraged when possible.

4. To answer consumer expectations of organic livestock management

Your comment that consumers expect organic livestock to have outdoor access is consistent with our understanding and with the general NOSB Principle (paragraph 1.3) that "The basis for organic livestock production is the development of a harmonious relationship between land, plants and livestock." ***Denying this principle would devalue the whole standing of organic standards in the perception of the public.***

The intent of the NOP was to create a uniform playing field concerning the state and private regulations governing certified organic production. Organic certification is a set of regulations based on the principles of sustainable organic agriculture. A farmer wishing to be certified must meld with the principles.

As with the examples of private labeling, if there is a specific criterion for meeting a label requirement, there are two choices. Either conform to the regulations of the standards or just not create a product that earns that label.

This same line of thinking prevails in the Organic Regulations: (205.238 (c)*(7)*: ... *Livestock treated with a prohibited substance must be clearly identified* ***and shall not be sold, labeled, or represented as organically produced*** *(emphasis added).* An animal that doesn't meet the regulations can't be sold as organic.

ARGUMENTS AGAINST OUTDOOR ACCESS

Four arguments are sometimes made against giving poultry outdoor access, but these can readily be addressed:

1. There is increased danger of predation

While this is true, it can be reduced to negligible risk by shutting poultry into the house at night, fencing outdoor areas and ensuring that people walk around the area occasionally. The latter provision is sufficient to deter daytime predatory birds such as hawks and should be normal practice for inspection of stock anyway.

2. Not all birds in large flocks go outdoors

This is no argument against providing access to outdoors for those birds that utilize it.

The fact that not all birds go outdoors is caused by two main factors, the unnaturally large flock size (combined with the fact that birds tend to move as a flock) and the lack of cover usual in outdoor areas (remembering that chickens evolved in forests).

We are pleased that the recommendation includes a requirement to "illustrate how the producer will maximize and encourage access to the outdoors" as this will maximize the number of birds that benefit.

The producer should provide ample doorways to allow egress from the house and should also consider providing cover (bushes, incomplete fences etc.).

3. It is sometimes claimed that free range birds have more problems such as cannibalism

This is not true. In birds that are not beak trimmed, cannibalism is worse in large groups than in cages, but is no worse in free range than in other non-cage systems. In any case, beak trimming is just as effective at preventing cannibalism and feather pecking in birds allowed access to outdoors as in other systems.

4. It is being claimed that providing access to the outdoors, the poultry are more susceptible to diseases, an example would be avian influenza.

Animals living outdoors could and often are exposed to diseases. Animals confined and concentrated into indoor facilities are susceptible to many diseases as well. This has been the argument by the agricultural industry for the subtherapeutic use of antibiotics.

Lately, the case of avian influenza has been in the news. There have been periodic outbreaks of the disease over the decades. In some areas, such as Minnesota, there have been cases nearly every year in turkeys from 1978-1996 (EU Scientific Committee on Animal Health and Welfare 2000). There was a large outbreak in Pennsylvania in 1983-84 (Minnesota Poultry Industry Task Force 1985) and a smaller outbreak in 1997 (Davison *et al.* 1997). There is a current outbreak in the Shenandoah Valley (The Delmarva Farmer 2002). In all these cases, the disease has been relegated to small regions in comparison to the whole country.

The sources of the outbreaks in Pennsylvania have been investigated thoroughly. The evidence for the 1983-84 spread of the disease between poultry houses and farms have ruled out contraction from waterfowl or small rodents (Wood *et al.* 1985, Nettles *et al.* 1985, Hinshaw *et al.* 1986, and Beard 2000). The evidence for contamination for both (1983-4 & 1997) outbreaks is likely to have come from contact with live bird markets (Davison, et al. 1997, Webster 1998, Beard 2000, and Suarez & Senne 2000).

Contact with infected birds at live bird markets has been proposed as being a major problem (Cardona 1998). Humans can carry virus from stepping in poultry manure and tracking it back to the farm. Humans can also be carriers of the virus for a short time within our bodies (Bean et al. 1985). There has been a great deal of studies published. Recommendations for prevention and control are varied. The main guidelines are sanitation, isolation from ducks, restriction from exposure to live bird markets, and limiting contact from outside visitors to poultry farms (Cardona 1998, Jeffrey 1998, Jacob *et al.* 1998, and USDA 2001).

RESERVATIONS ABOUT THE PROPOSED STANDARD

The proposed standard covers all species of poultry, and three diverse categories of birds: layers, broilers and breeders. Yet it is very brief, with some aspects very loosely specified. It may be appropriate in the future to expand the wording to give more detailed specifications for different categories of poultry, but we recognize that this would be ambitious at the present time. We are concerned about the following:

1. Minimum outdoor area should be specified

No indication is given of how much outdoor area should be provided, so a producer could, in theory, meet this requirement by providing a tiny area. It is difficult to specify an area appropriate to all categories of poultry but we suggest, as a starting point, that the outdoor area should be at least the same size as the area of their housing.

2. Planning should include poultry well-being and environmental protection

Provisions 2c and 2d allow confinement to safeguard the well-being of the poultry and the soil or water quality. However, there is a risk that these provisions will be used to justify confinement in circumstances that should have been foreseen. The producer's organic system plan should include measures to protect the well-being of both the birds

and their environment. This is implicit in the current phrasing but should be made explicit.

The organic system plan needs to be thought through totally by prospective organic poultry producers. The purpose of the organic plan is to identify the steps that will be used to follow organic production practices. If, after working out the plan, one discovers that the organic rules can't be met, then the products that would be produced simply can't be labeled organic.

I would like to refer to the Preamble Section of the Regulations. Subpart C – Organic Crop, Wild Crop, Livestock, and Handling Requirement: Description of Regulation: General Requirements.

"The producer of an organic livestock operation must establish and maintain preventive animal health care practices. The producer must select species and types of livestock with regard ***to suitability for site specific conditions and resistance to prevalent diseases and parasites*** *(emphasis added). The producer must provide a feed ration including vitamins, minerals, protein, and/or amino acids, fatty acids, energy sources, and sanitation practices to minimize the occurrence and spread of diseases and parasites.* ***Animals in an organic livestock operation must be maintained under conditions which provide for exercise, freedom of movement, and reduction of stress appropriate to the species*** *(emphasis added). Additionally, all physical alterations performed on animals in an organic livestock operation must be conducted to promote the animals' welfare and in a manner that minimizes stress and pain."*

This section refers to dealing with possible health factors. Look for a site where diseases would be less prevalent and pick breeds that are hardy and resistant. It is recognized that the animals need exercise, and freedom of movement. These factors are not found indoors, particularly under caged conditions.

Several paragraphs later... *"The producer of an organic livestock operation must establish and maintain livestock living conditions for the animals under his or her care* ***which accommodate the health and natural behavior of the livestock****.* ***The producer must provide access to the outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight suitable to the species, its stage of production, the climate, and the environment*** *(emphasis added). This requirement includes access to pasture for ruminant animals. The producer must also provide appropriate clean, dry bedding, and, if the bedding is typically consumed by the species, it must comply with applicable organic feed requirements.* ***The producer must provide shelter designed to allow for the natural maintenance, comfort level, and opportunity to exercise appropriate to the species*** *(emphasis added). The shelter must also provide the temperature level, ventilation, and air circulation suitable to the species and reduce the potential for livestock injury... The producer of an organic livestock operation is required to manage manure in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, heavy metals, or pathogenic organisms and optimizes nutrient recycling."*

By supporting the need for outdoor access, you will galvanize the heart of the regulation that this paragraph refers to. What we don't want to see is the creation of certified organic concentrated animal feeding operations.

3. "Temporary confinement" is not defined

There is also a risk that producers may confine birds for most of the time under the provision allowing temporary confinement. However, we recognize that it is difficult to define this term in a way appropriate for all categories of poultry and all circumstances. For now, we wish to emphasize that the word "temporary" must be retained in the final wording of the standard.

Referring back to Subpart C – General Changes Based on Comments -#4 Conservation of Biodiversity... *"Many commenters recommended amending the definition of organic production to include the requirement that an organic production system must promote or enhance biological diversity (biodiversity). Commenters stated that the definitions for organic production developed by the NOSB and the CODEX Commission include this requirement. We agree with these commenters and have amended the definition of organic production to require that a producer must conserve biodiversity on his or her operation. The use of "conserve" establishes that the producer must initiate practices to support biodiversity and avoid, to the extent practicable, any activities that would diminish it. Compliance with the requirement to conserve biodiversity requires that a producer incorporate practices in his or her organic system plan that are beneficial to biodiversity on his or her operation."*

Without the access to outdoors, birds would be kept in a building their whole lives. This is not an activity that supports biodiversity but an activity that diminishes it and must be avoided. Allowing for this outdoor access, based on a strong organic system plan, can be part of a rotational system for other parts of the agricultural enterprise that makes up the farm or at least be part of a rotational plan for the vegetative regeneration of the poultry yard. Farmers moving into poultry production should adopt a system that assists in the reduction of disease and parasites through careful management.

RECOMMENDATIONS

The key points we have made above would be clarified by alterations to the Recommended Standard, as follows. The word "temporary" is highlighted in the second clause to emphasize the importance of its retention.

> 1. Organically managed poultry must have DAYTIME access to AN OUTDOOR AREA AT LEAST AS LARGE AS THE AREA OF THEIR HOUSE during the months of the year when feasible. The producer's organic system plan must illustrate how the producer will maximize and encourage access to the outdoors, BY PROVISION OF AMPLE DOORWAYS AND OTHER MEASURES SUCH AS COVER (FOR EXAMPLE BUSHES OR FENCES).
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> 2. The producer's ORGANIC SYSTEM PLAN SHOULD EXPLAIN HOW BOTH THE BIRDS AND THEIR OUTDOOR ENVIRONMENT WILL BE PROTECTED, INCLUDING, FOR EXAMPLE, JUSTIFICATION FOR CHOICE OF SITE. IN EXCEPTIONAL CIRCUMSTANCES EXPLAINED IN

THE PLAN, THE PRODUCER MAY provide **temporary** confinement because of:
a. Inclement weather;
b. The stage of production, up to 5 weeks of age;
c. Conditions under which the health, safety, or well-being of the poultry could be jeopardized;
d. Risk to soil or water quality.

3. If the producer of poultry wishes to obtain organic certification, then clear adherence to the rules must be followed. If the health of a flock, particularly during a period of time could be jeopardized from an epidemic, THEN ALL APPROPRIATE MEASURES MUST BE TAKEN TO ENSURE THE WELL BEING OF THE BIRDS. If this means that total restriction of access to the outdoors is necessary, then this must be followed. IF THIS CONFINEMENT IS DEEMED NECESSARY, THEN THE ANIMAL PRODUCTS DERIVED FROM THE BIRDS CAN NOT BE SOLD AS ORGANIC.

We further recommend that consideration be given in future to more detailed standards for different species and categories of poultry.

There have also been issues raised about the use of 100% organic feed requirement for animal rations. This is a very important standard to maintain. It has two major benefits.

1) Organic integrity is paramount. Consumers trust that a product labeled as organic means that it has been produced under organic principles with organic ingredients.
2) Requiring 100% feed will provide incentives for the grain farmers of this country to meet the market needs. I have worked with hundreds of grain growers who would like nothing more than contract with organic animal producers. With this type of association, both farming enterprises will benefit.

In conclusion, we wish to lend our support for the provision of allowing outside access for all poultry. We hope this will set a precedent for future provisions that ensure greater welfare for livestock. Livestock can be the cornerstone of a true sustainable agricultural approach. Any strengthening of the regulations will go far to build the support and trust of the farmers and for consumers.

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For your information, I carried out scientific research on behavior, housing and welfare of poultry for 20 years at the Poultry Research Centre, Edinburgh and the University of Edinburgh, before coming to the USA in 2001. I am senior author of a book on the subject (Appleby et al 1992).

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